

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 RUDY Y. KIM (CA SBN 199426)  
RKim@mofo.com  
5 MORRISON & FOERSTER LLP  
425 Market Street  
6 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522  
  
8 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
9 OTTOMOTTO LLC, and OTTO TRUCKING LLC

10 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsflp.com  
11 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsflp.com  
12 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
13 Washington DC 20005  
Telephone: 202.237.2727  
14 Facsimile: 202.237.6131

15 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,  
21 Plaintiff,  
22 v.  
23 UBER TECHNOLOGIES, INC.,  
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THEIR MOTION  
FOR SUMMARY JUDGMENT OF  
NON-INFRINGEMENT AND  
SUPPORTING DECLARATION**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,  
 2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)  
 3 submit this motion for an order to file under seal the confidential, unredacted versions of the  
 4 following documents:

- 5 1. Portions of Defendants’ Motion for Summary Judgment of Non-Infringement  
 6 (“Motion”);
- 7 2. Portions of the Declaration of James Haslim in Support of Defendants’ Motion  
 8 (“Haslim Declaration”)
- 9 3. The redacted portions of Defendants’ Motion and the Haslim Declaration contain  
 10 Defendants’ proprietary technical information. The design of Uber’s custom LiDAR system is  
 11 proprietary and highly confidential and, if made public, would cause Uber irreparable harm in this  
 12 very competitive space of autonomous driving. (Yang Decl. ¶ 2.)

13 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
 14 documents at issue, with accompanying chamber copies.

15 Defendants served Waymo with this Administrative Motion to File Documents Under  
 16 Seal on May 2, 2017.

17 For the foregoing reasons, Defendants request that the Court enter the accompanying  
 18 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and  
 19 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –  
 20 ATTORNEYS’ EYES ONLY.”

21 Dated: May 2, 2017

MORRISON & FOERSTER LLP

22 By: /s/Michael A. Jacobs

23 MICHAEL A. JACOBS

24 Attorneys for Defendants  
 25 UBER TECHNOLOGIES, INC.,  
 26 OTTOMOTTO LLC, and OTTO TRUCKING LLC  
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